

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:

LeClairRyan PLLC,

Debtor¹

Case No.: 19-34574-KRH

Chapter 7

**NOTICE OF FILING UNDER SEAL OF
PROPOSED FAO SETTLEMENTS**

PLEASE TAKE NOTICE THAT Lynn L. Tavenner, not individually but solely in her capacity as the Chapter 7 trustee (in such capacity, the “**Chapter 7 Trustee**” and/or the “**Trustee**”) of the bankruptcy estate (the “**Estate**”) of LeClairRyan PLLC (“**LeClairRyan**” and/or the “**Debtor**”), in the above-referenced Chapter 7 case (the “**Case**”), filed under seal with the United States Bankruptcy Court for the Eastern District of Virginia (the “**Court**”), pursuant to the *Order Approving Procedures and Permitting Trustee to Prosecute and Compromise FAO Actions* [ECF No. 533], and as thereafter modified by Court Orders, ECF Nos. 929 and 982 (collectively, the “**FAO Procedures Order**”),² a Third Notice of Proposed FAO Settlements [ECF No. 1081] (the “**Third Notice of Proposed Settlements**”) describing proposed settlements with the following individuals:

Rodney K. Adams
Neil Brodsky
Andrew Cole
Dean M. Colucci
Brian Petrequin
John A. Pirko
Robert Smith
Peter B. Van Deventer, Jr.

All of the above referenced individuals have requested that the both the terms of the Proposed FAO Settlement and the settlement agreements be subject to a protective order as permitted under the FAO Procedures Order. Accordingly, as indicated above, the Third Notice of Proposed Settlements was filed under seal. *See* ECF No. 1081.

This notice is being provided to publicly announce the filing of the Third Notice of Proposed Settlements and the procedures outlined therein. If an Interested Party (as defined in the FAO Procedures Order) desires to object to the Trustee proceeding with final consummation of any said settlement, then within fifteen (15) days of the service of this Notice, he/she/it must file

¹ The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor’s federal tax identification number are 2451.

² Terms not otherwise defined shall have the meanings ascribed to them in the FAO Procedures Order.

with the Court, at the address shown below, a written response with supporting memorandum pursuant to Local Bankruptcy Rule 9013-1 and the FAO Procedures Order; and send or otherwise file it early enough so the Court will receive it on or before fifteen (15) days from the date of service of this Notice.

Clerk of the Court
United States Bankruptcy Court
701 E. Broad Street, Suite 4000
Richmond, VA 23219

Any of the Interested Parties must also serve a copy on:

Paula S. Beran, Esq.
Tavenner & Beran, PLC
20 North Eighth Street,
2nd Floor
Richmond, VA 23219

Erika L. Morabito, Esq.
Brittany J. Nelson, Esq.
Quinn Emanuel Urquhart &
Sullivan LLP
1300 I Street NW, Suite 900
Washington, DC 20005

Shannon F. Pecoraro, Esq.
Office of the United States Trustee
701 East Broad,
Suite 4304
Richmond, VA 23219

If these steps are not taken, any opposition is deemed waived, and the Trustee may consummate the Proposed FAO Settlements without further notice or hearing.

Dated: October 22, 2021

Respectfully submitted,

/s/ Brittany J. Nelson

*Special Counsel to Lynn L. Tavenner, Esq., the
Chapter 7 Trustee of Estate of LeClairRyan PLLC*

LOCAL BANKRUPTCY RULE 2002-1 CERTIFICATE OF SERVICE

I certify that on this 22nd day of October 2021, a true copy of the foregoing Notice was served on (i) the Office of the United States Trustee, (ii) the 20 largest unsecured creditors as listed on the Debtor's schedules, and (iii) any other party who has made a written request to Paula S. Beran, Esquire and filed on the Court's CM/ECF system.

/s/ Brittany J. Nelson